

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA

Plaintiff,

v.

ERIC CAMPBELL

Defendant.

CASE NO.

JUDGE

INDICTMENT

18 U.S.C. §§ 2252(a)(2) & (b)(1)

18 U.S.C. §§ 2252(a)(4)(B) & (b)(2)

FILED
RICHARD W. NAGEL
CLERK OF COURT

2025 MAR 18 AM 10:51

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST. DIV. COLUMBUS

2:25-CR-43
Judge Morrison

THE GRAND JURY CHARGES:

COUNT ONE

(Receipt of Child Pornography After Prior Conviction)

1. On or about June 17, 2024, in the Southern District of Ohio, the defendant, ERIC CAMPBELL, having been previously convicted of a violation of Chapter 117 of the United States Code – that is on August 12, 2010 in the Southern District of Ohio, for one count of Coercion and Enticement, in violation of 18 U.S.C. § 2422(b) – did knowingly receive one or more visual depictions using any means and facility of interstate and foreign commerce, including the internet and a cellular phone, the production of such visual depictions having involved the use of a minor engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), and such depictions being of such conduct, to wit: digital images and/or video files depicting lascivious display of the genitalia, anal penetration and oral intercourse involving Jane Doe and John Doe.

In violation of 18 U.S.C. §§ 2252(a)(2) & (b)(1).

COUNT TWO
(Possession of Child Pornography After Prior Conviction)

2. On or about August 19, 2024, in the Southern District of Ohio, the defendant **ERIC CAMPBELL**, having been previously convicted of a violation of Chapter 117 of the United States Code – that is on August 12, 2010 in the Southern District of Ohio, for one count of Coercion and Enticement, in violation of 18 U.S.C. § 2422(b) – did knowingly possess matter, that is, digital image and video files stored on a cellular telephone, which contained one or more visual depictions that had been transported using any means and facility of interstate and foreign commerce, the production of such visual depictions having involved the use of prepubescent and pubescent minors engaging in sexually explicit conduct, as defined in 18 U.S.C. § 2256(2)(A), and such visual depictions being of such conduct.

In violation of 18 U.S.C. §§ 2252(a)(4)(B) & (b)(2).

FORFEITURE ALLEGATION

3. The allegations of this Indictment are hereby incorporated by reference as if fully rewritten herein for purposes of alleging forfeitures to the United States of America pursuant to 18 U.S.C. § 2253.

4. Upon conviction of the offense alleged in either Count One or Count Two of this Indictment, the defendant, **ERIC CAMPBELL**, shall forfeit to the United States:

- (a) all matter containing said visual depictions of child pornography and child erotica, transported, mailed, shipped and possessed in violation of 18 U.S.C. § 2252; and
- (b) all property used and intended to be used to commit and to promote the commission of the aforementioned violations, including but not limited to the following:
 - One Samsung Galaxy A14 cell phone, IMEI 352096690839842.

Forfeiture in accordance with 18 U.S.C. §§ 2253(a)(1) and (3), 28 U.S.C. 2461(c), and Rule 32.2 of the Federal Rules of Criminal Procedure.

A TRUE BILL.

s/Foreperson

GRAND JURY FOREPERSON

**KELLY A. NORRIS
ACTING UNITED STATES ATTORNEY**



JENNIFER M. RAUSCH (0075138)
Assistant United States Attorney